

1 MICHELE BECKWITH
2 Acting United States Attorney
3 JAMES R. CONOLLY
4 Assistant United States Attorney
5 501 I Street, Suite 10-100
6 Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900
7
8 Attorneys for Plaintiff
United States of America

9
10 IN THE UNITED STATES DISTRICT COURT
11
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

LOUIS JAMES STOKES,

16 Defendant.

CASE NO. 2:24-cr-00031-JAM

**THIRD STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME**

DATE: March 25, 2025

TIME: 9:00 a.m.

COURT: Hon. John A. Mendez

17
18
19
20
21
22
23
24
STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on March 25, 2025.
2. By this stipulation, defendant now moves to continue the status conference until **May 06, 2025, at 09:00 a.m.**, and to exclude time between March 25, 2025, and May 06, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case that it has produced thus far includes over 200 pages of investigative reports, DEA laboratory reports, and photographs. Discovery also includes physical evidence including a pill press, chemicals used to manufacture pills, and other related equipment. This discovery has been either produced directly to counsel or, for the physical evidence, will be made available for defense inspection.

1 b) Additionally, defense counsel has made requests for additional discovery across a
2 range of categories, including investigative reports, video footage, and mobile telephone data.
3 The government has produced several reports in response to these requests, which defense
4 counsel has started to review. The government is also working to identify and produce
5 additional discovery, including video footage and mobile telephone data, which it anticipates
6 completing in the next two to three weeks.

7 c) Counsel for defendant desires additional time review the discovery that has been
8 produced, inspect the physical evidence, and to review the discovery he anticipates receiving
9 from the government in the near future. In addition, defense counsel needs additional time to
10 consult with his client, to review the current charges, to conduct further investigation, and to
11 discuss potential resolutions. Defense counsel will also need more time to determine whether this
12 case will proceed to trial, to prepare pretrial motions in that event, and to otherwise prepare for
13 trial.

14 d) Counsel for defendant believes that failure to grant the above-requested
15 continuance would deny him/her the reasonable time necessary for effective preparation, taking
16 into account the exercise of due diligence.

17 e) The government does not object to the continuance.

18 f) Based on the above-stated findings, the ends of justice served by continuing the
19 case as requested outweigh the interest of the public and the defendant in a trial within the
20 original date prescribed by the Speedy Trial Act.

21 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
22 et seq., within which trial must commence, the time period of March 25, 2025 to May 06, 2025,
23 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
24 because it results from a continuance granted by the Court at defendant's request on the basis of
25 the Court's finding that the ends of justice served by taking such action outweigh the best interest
26 of the public and the defendant in a speedy trial.

27 ///

28 ///

1 ///

2 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
3 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
4 must commence.

5 IT IS SO STIPULATED.

6 Dated: March 18, 2025

7 MICHELE BECKWITH
Acting United States Attorney

8 /s/ JAMES R. CONOLLY
9 JAMES R. CONOLLY
10 Assistant United States Attorney

11 Dated: March 18, 2025

12 /s/ MICHAEL D. LONG
13 MICHAEL D. LONG
14 Counsel for Defendant
15 LOUIS JAMES STOKES

16 **ORDER**

17 IT IS SO ORDERED.

18 Dated: March 18, 2025

19 /s/ John A. Mendez
20 THE HONORABLE JOHN A. MENDEZ
21 SENIOR UNITED STATES DISTRICT JUDGE